

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TENNESSEE  
WESTERN DIVISION**

CHRIS SECHLER, )  
                        )  
                        )  
Plaintiff,         )  
                        )  
v.                     )     **Case No. 2:14-cv-2574-SHL-cge**  
                        )  
BYRDCORP, INC., d/b/a ELITE )  
MULTIMEDIA, a Tennessee )  
Corporation, PIXELFLEX, LLC, a )  
Tennessee Limited Liability Company, & )  
ELITE                 MULTIMEDIA )  
PRODUCTIONS, INC.,         )  
                        )  
Defendants.         )

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**STIPULATION OF DISMISSAL WITH PREJUDICE**

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Upon consent of the parties, as evidenced by the signatures of counsel below, it is hereby STIPULATED AND DECREED that the action should be, and hereby is, dismissed with prejudice pursuant to Rule 41(a)(1)(A)(ii) of the Federal Rules of Civil Procedure. Each party shall bear its own costs and attorneys' fees.

For the Defendant:

s/Thomas L. Henderson \_\_\_\_\_  
Thomas L. Henderson (TN BPR No. 11526)  
Kristy L. Gunn (TN BPR No. 22821)  
Audrey M. Calkins (TN BPR No. 30093)  
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For the Plaintiff:

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s/Laura Ann E. Bailey \_\_\_\_\_  
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**CERTIFICATE OF SERVICE**

I hereby certify that I have this 6th day of July, 2015, caused the foregoing to be electronically filed using the Court's CM/ECF filing system which will provide notice of such filing to the following:

Thomas L. Henderson (TN BPR No. 11526)  
Kristy L. Gunn (TN BPR No. 22821)  
Audrey M. Calkins (TN BPR No. 30093)  
OGLETREE, DEAKINS, NASH,  
SMOAK & STEWART, P.C.  
6410 Poplar Avenue, Suite 300  
Memphis, TN 38119

s/Laura Ann E. Bailey

**CERTIFICATE OF CONSULTATION**

I, Laura Ann E. Bailey, hereby certify that I have on this 6<sup>th</sup> day of July, 2015, consulted with Attorneys for Defendant, Thomas L. Henderson and Audrey M. Calkins via email regarding this Stipulation of Dismissal with Prejudice, and that counsel for Defendants consents to the filing of the motion.

s/ Laura Ann E. Bailey